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Attorneys for Defendants HAMMER & STEEL,  
INC. and LISA GASSER

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JAMES SCHRECKENGOST, an individual,

Plaintiff,

vs.

HAMMER & STEEL, INC., a Missouri  
corporation; LISA GASSER, an individual;  
and DOES 1-10, inclusive,

Defendants.

CASE NO.

**DECLARATION OF SUMY KIM IN  
SUPPORT OF DEFENDANTS' NOTICE  
OF REMOVAL OF CIVIL ACTION  
PURSUANT TO 28 U.S.C. § 1441(b)  
(DIVERSITY)**

Action Filed: February 11, 2021  
Trial Date: None Set

I, Sumy Kim, declare as follows:

1. I am an attorney at law duly admitted to practice in the State of California. I am a partner in the law firm of Lewis Brisbois Bisgaard & Smith, LLP, counsel of record for Defendants HAMMER & STEEL, INC. ("H&S") and LISA GASSER ("Gasser") (collectively referred to as "Defendants") in this action. I make this Declaration in support of Defendants' Notice of Removal of Action to Federal Court. All of the information set forth herein is based on my personal and firsthand knowledge or based on information or documents retained by our firm in the regular course of its business operations and, if called and sworn as a witness, I could and would competently testify thereto.

2. Plaintiff filed his original complaint on February 11, 2021. A true and correct copy

1 of the Complaint is attached hereto as **Exhibit A**.

2 3. The Summons and Complaint were served to H&S on February 25, 2021 via  
3 substitute service. A true and correct copy of the current online Court docket is attached hereto as  
4 **Exhibit B**.

5 4. The Summons and Complaint were served to Gasser on February 25, 2021 via  
6 personal service. See **Exhibit B**.

7 5. On March 26, 2021, Defendants answered in the State Court action. A true and  
8 correct copy of the Answer is attached hereto as **Exhibit C**.

9 6. After the filing of the Notice of Removal in the United States District Court for the  
10 Northern District of California, our office will be providing written notice of the removal to  
11 Plaintiff's counsel of record. In addition, a copy of the Notice of Removal will be filed with the  
12 Clerk of the Court for the Solano Superior Court.

13  
14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

16  
17 Executed on March 29, 2021, at San Francisco, CA.

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20 /s/ Sumy Kim  
21 Sumy Kim  
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